

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.)
Plaintiff)
)
v.) Case No.PJM 08 cv 0921
)
WORLD AVENUE USA, LLC, et al.)
Defendants)
_____)

JOINT STIPULATION REGARDING DOCKET ENTRIES 142 THROUGH 154

Pursuant to Rules 26(c), 33, and 34, Fed. R. Civ. P., Defendants World Avenue Holdings, LLC and World Avenue USA, LLC (“USA”) and Plaintiff Beyond Systems, Inc. (“BSI”) submit this Joint Stipulation regarding the discovery dispute that was brought before the court in Docket Entries 142 through 154. The parties have resolved several of the scheduling issues raised in the Motions, Oppositions and Replies (DE’s 142 through 154) as set forth below:

1. USA shall respond to BSI’s First Set of Interrogatories and BSI’s First Request for Production of Documents and produce documents on January 29, 2010;
2. USA shall appear for the ESI deposition on February 18, 2010, and on and February 19, 2010 if a second day is needed;
3. The USA ESI deposition shall be conducted at USA's counsel's offices in Washington, DC;
4. The Parties request the court amend the Scheduling Order to extend the deadline for amending pleadings and adding parties to February 27, 2010; and
5. The parties shall continue to cooperate in the scheduling of additional depositions and the scope of all depositions. This Joint Stipulation is without prejudice to any arguments of USA or BSI pertaining to the USA ESI Deposition, and BSI and USA reserve the right to have any

issues on the scope of the USA ESI Deposition to be resolved by the Court prior to or at the USA ESI Deposition.

Dated this 12th day of January 2010.

Respectfully submitted,

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--and--

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By: /s Michael S. Rothman

Dated this 12th day of January 2010.

Respectfully submitted,

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By: /s John L. McManus

¹ Permission to affix electronic signature on this Joint Stipulation on behalf of counsel for Plaintiff has been granted to counsel for Defendants.

SO ORDERED:

USDCJ

DATED: January __, 2010